

UNITED STATES DISTRICT COURT

for the

EASTERN District of MICHIGAN

ORIGINAL

Division

Case:2:19-cv-10862

Judge: Friedman, Bernard A.

MJ: Majzoub, Mona K.

Filed: 03-25-2019 At 10:55 AM

CMP SHEBLI v VANDEVEER GARZIA P.C.,

ET AL (dat)

HUSSEIN SHEBLI

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Anthony McEachern
VANDEVEER GARZIA P.C. FIRM

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Hussein Shebli
Street Address	25834 Avondale
City and County	Inkster, Wayne
State and Zip Code	Mi. 48141
Telephone Number	(313)-334-8904
E-mail Address	samfoxx1967@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Vandever Gazia
Job or Title <i>(if known)</i>	President of corporation
Street Address	840 Long Lake Rd., Ste. 600
City and County	Troy, Oakland
State and Zip Code	Mi. 48098-6340
Telephone Number	(248)-312-2800
E-mail Address <i>(if known)</i>	bdrownell@vgpclaw.com

Defendant No. 2

Name	Anthony J McEachern
Job or Title <i>(if known)</i>	officer, Attorney
Street Address	840 Long Lake Rd., Ste. 600
City and County	Troy, Oakland
State and Zip Code	Mi. 48098-2800
Telephone Number	(248)-312-2800
E-mail Address <i>(if known)</i>	dbrownell@vgpclaw.com

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Act of 1871, 42 U.S.C. & 1983 Civil Rights

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Hussein Shebli, is a citizen of the
State of *(name)* United States of America

b. If the plaintiff is a corporation

The plaintiff, *(name)*, is incorporated
under the laws of the State of *(name)*,
and has its principal place of business in the State of *(name)*

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)*, is a citizen of
the State of *(name)*. Or is a citizen of
(foreign nation)

b. If the defendant is a corporation

The defendant, (name) Vandeveer Garzia professional Corp. , is incorporated under the laws of the State of (name) U.S.A , and has its principal place of business in the State of (name) Michigan .
 Or is incorporated under the laws of (foreign nation) U.S.C. ,
 and has its principal place of business in (name) Troy, Mi. U.S.A .

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

The amount of \$260,000.00 plus punitive damages

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Vandeveer Garzia law firm was representing Allstate insurance com. in a head Injury, when the Plaintiff was struck in the head, by a splitting tree, that was dieing and dangerous and could have been prevented, so when the plaintiff would not except a lowball offer and had overwhelming evidence that would have destroy the defence at a trail ,the defedant, through four lawyers had the plaintiff assulted,threatend,aslo, committing felony fraud, by falsefying IME records, then on April 10, 2017 in the Wayne count circuit court, they conspired with a county shariff, and Judge, to deprive the plaintiff of any rights, in a court of law, going as fare as assult & Battering on the plaintiff, on two occasions, in the court house, infront of everyone, with no fear, of the laws,because (He said he is the Law in that court)then they forced the plaintiff, to accept the offer, and sign release papers, with unbeleivable misconduct,and felony fraud, barly covering \$20 daily help at home leaving him to suffer in silence,and lose evryone and everything around him, and unable to seek the proper medical help needed very badly) as his injury keeps getting worse, making everything in his life difacult to do, including eat, or walk or get dressed or even remember his way home, from were ever he is,(one attorney stated he was going to delay the trail till the plaintiff has an accedant that kills him) witch was very likely, the plaintiff was so scared to go back to that court room, even after the chief, put two deputy's, in that court room, for the days the plaintiff in pro per was scheduled to apear,he had no idea who was going to be beat him down, and how bad the beat down, would be,due to the fact that the first two beat downs by the sharif almost broke his neck.this clearly is not liberty and justice for all.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The \$260,000.00 is the amount the firm deprived the plaintiff of receiving from his policy that would have covered him and would have allowed him to seek the proper medical attention to live with a head injury, but what the firm put the plaintiff through, during the 2 plus years, in litigation, nobody should have to experience that kind of torture, or trauma on top of their injury, even so they represent themselves, without choice, therefore punitive damages, we pray this Honorable court order another \$500,000.00 in damages for the 45 plus actions of misconduct, and fraud this firm committed unto the plaintiff, mediation, and in a court of law on record and off record. We respect hard working attorneys with good strategies, they work hard all their life and deserve a good life, but when the laws are not respected in a court of law, these are the attorney's that make the public think the worst about officers of the court and no one will trust any one, which of course is not the case our system is great and we have total faith in our courts, otherwise they would collapse that's why our country is so great equal rights. God bless you and your family, for your time, Your Honor

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3-24-2019

Signature of Plaintiff

Printed Name of Plaintiff

Hussein Sheb
Hussein Sheb

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

WITNESSES TO BE CALLED ON BEHALF OF PLAINTIFF

- | | |
|---------------------------|---|
| 1. Laurie Fox Riley | Friend |
| 2. Mike Jaafer | Chief of Police (Wayne County Sheriff) |
| 3. Angela Bronson | Special Agent FBI |
| 4. Stanley R Mikicuik | P.C Attorney |
| 5. Nazim ALhussein | M.D |
| 6. Ali Shebli | Diffident |
| 7. Brian | Judge Hathaway's legal aid |
| 8. Alexia Jackson | IME Dr. Bakers secretary |
| 9. Nancy Rosenberg | ALLSTATE Insurance Com. (Customer service) |
| 10. Ali Baudoun | Court Officer (Wayne County Sharif) |
| 11. Brandon Shamoun | Attorney Substitute for McEachern |
| 12. David Aldrich | Department of Insurance and Financial Services |
| 13. Cynthia C. Bullington | Attorney Grievance Commission Ass. Deputy Administrator |
| 14. Brian Gaal | Allstate Insurance Company Defendant |
| 15. Precious Smith | Judge Hathaway's court clerk |

These are witnesses, that will back up my allegations, that are facts and as long as I can have subpoena power and them testify all statements will be proven true beyond any reasonable doubt.

EXHIBIT **C**Benny N. Napoleon
SheriffDaniel Pfannes
Undersheriff

Citizen Complaint Form

Complainant's Last Name: Shah First: Hussein M.I.: M

Address: 25834 Acondale Daytime Phone: 313-334-8904
Inkster MI 48141 (Area Code) Telephone
 City State Zip Code

Date of Birth: 8-1-67 Home Phone: 313 504-2836
 (Area Code) Telephone

Name(s) of involved Sheriff's employee(s), if known. If not, please provide a description of the employee(s) and/or vehicle:

EVIDENCE

Court Officer in 1611 Daniel A. Hatcher, My Attorney was sent to Court to Abandon Me So I had to Represent My Self in order for me to get any help with medical I have been sitting, talking, listening some time with his car for 9 months. So he knows I was injured had hard time healing for the past 14 yrs.

Location of Incident:

Calvin A. King Building
Please Pull hallway Surveillance

Date & Time of Incident:

April 10th 9:00 AM it's like everyone
Ignored, The litigations just wanted to end.

Brief description of incident (additional pages may be used if necessary):

I don't know who gave the order But I think
not sure, because he strangled me on the way up stairs
I thought I was dreaming, No it was in front of everyone
I won my case, under MCR 2.116 (F) I finally
even from a Host Attorney How to Answer a motion
The Deference offered \$15000 The Judge said I brought
your case is only worth \$10000 while Sheriff was
standing next to me in the courtroom

REPORT HANDED TO CHIEF MIKE JAAFER PERSONALLY ON 4-19-2017

Dear Mike I have no choice but to report to you, due to the facts that the Jaafers are the only cops know wear the blindfold to justice, I have been representing myself because Allstate paid off Ciral Hall into withdrawing from my case. Knowing head injuries goes into the millions. Then Mr. Hall sabotaged my file by pulling out all the important documents from it so no other attorney follows up my case, (witness Attorney Stain R Mikiciuk 313-563-1767). When I went to him, not KNOWING how the law works He said were are the rest of the file. So he pulled a brief that shows all the filing. Then he said go back and tell them you're going to call the Attorney Grievance Commission if they don't give you the rest of your file, that's when Mr. Hall gave me another 200 pages that he and Anthony McEachern had pulled from the file. Then I returned to Stanes office, He said it's still not fair and sent me back. He also said they had a lien on the case. So I asked for a release from them. when I returned he had talked to someone and said, Sorry I can't help you. Leaving me to file a appearance on behalf of myself. I have been fighting for 8 months with a neck and head injury, catching Allstate of committing 12 counts of fraud and screaming in the court he is committing fraud. The judge said lets move on. Unbelievable actions by the judge so I went to chief judge Columbo. They gave me a list of attorneys that work to help the poor and for free. I still could not get any representation. So I went to the book store and got Michigan Court Rules book and answered the motions properly with the law number and standard review. when they see that, the judge took me in the back off record and said your case is only worth 10,000 and said you should settle, after that the insurance com. Offered 15000 the judge said there you go jump on it. I got scared of what is going on, and said have him put it in writing, So Anthony McEachern did and I showed my wife she said we been fighting this for 4 years and I'm tired of wiping your but if you take that, Go live with your mother. So I denied it. When I arrived at the Hearing on April 10th the judge called my case first, and listed to me say that I was the one who was entitled to summary Disposition by law, he just ignored me and the Attorney said he wanted to delay the trial. I said please no All my witnesses cleared that date. The judge said so what and adjured the trial to July 24th. I could not believe what was going on. After that I said have a happy Easter to the Judge, He looked down and didn't answer me. I did not know what was happening then the court officer told me get your thing and come with me. I thought we were going to the back to settlement conference, I told the cop were we going he said upstairs, I said please I have a important appointment with the Noroiligist I have to get there in the hall way I front of a bunch of people he grabbed me by the neck and said don't get squarely on me, then yanked me into the elevator Livonia wants your ass, I said Oww Oww Please it's a mistake he held me and took me to a jail cell trying to strip me of my close. I couldn't believe how he was handling me, and my neck pain was overwhelming I lost my breath and my head and chest caused me to almost pass out. The Sargent called Livonia, They said we don't want him so, They said your free to go after almost breaking my neck. I don't know Who ordered him to do that if it was the Adjuster that he was friends with because they are losing their case against a regular citizen, or it was the Judge that was trying to force me to take the 15000, But one of them must be on the take, trying to scare me into settling without further a due. I have over whelming Evidence of everything I just stated and am planning on going to the FBI. My case is worth 2 million and they know that and are doing everything to prevent that from happening. I fair for my life and I have to bring this to someone's attention before I get waked like Mark Hyaders Father in the 80s, I know that's what happened. Please Help me. I can't take on a company that makes 30 billion a year defrauding the public. I need some help and someone to look at my evidence. My neck took two years to heal from the accident this cop twisted my neck bringing all that pain back even though he knows I'm injured person going through hell representing myself. He had no regard's for my life and grabbed my neck over a three year old misdemeanor warrant that was not supposed to be there, I want to press charges on this officer because he knew my situation and did not care about me or my family by resulting my neck just to satisfy the adjuster.

Report To Chief
of Police

on 4-19-17

22

that he probley got a payoff one way or another I have so much more evidence of this corruption and want a official to look at it. Please have someone contact me for an interview. Someone that honest and is not on the take from Allstate. It seems like they got to a lot of people in this case. When Mediation Judges that followed me out in the hallway and said you better take this five thousand or you're going to pay court costs and penalty's trying to scare me again into settling the case. I can prove everything I said I tape record everything because of my head injury, my memory is going bad and worsening on a daily bases.

Sincerely Hussein Shebli (Sam)

Address:

Name:

Address:

Phone:

8 people

3 Feb. m. By The

Everyone in The Hall seen him
Tie and tie my shirt. Pulled m

COMPLAINANT'S AFFIRMATION

I do solemnly swear or affirm that the above information is true to the best of my knowledge. I understand that based on this complaint, an investigation will be conducted and if substantiated, appropriate will be taken. I further understand that if the investigation proves the allegations were known by me to have been false when the complaint was made, that the accused employee(s) may pursue legal remedies against me.

Complainant's Signature

Date

This form may be submitted at any Wayne County Sheriff's facility or mailed to:

Wayne County Sheriff's Internal Affairs Unit
1231 St. Antoine St.
Detroit, MI 48226
(313) 224.0610

Office Use Only

Employee Receiving Complaint:

Cpl. Marvin Taylor

Police officer

Print Name

Title

Signature:

Cpl. Marvin Taylor #2189

Date & Time:

4-19-17/1420

Division:

HQ

How was complaint received:

☒

In Person

☐

Telephone

☐

Mail

☐

Other

Specify

Supervisor receiving complaint:

Print Name

Title

Reviewed by Divisional Commander:

Date:

Received in Internal Affairs:

Date

I.A.S. Case #:

Document received by the MI Wayne 2nd Circuit Court

Restraint
05
Ex P

Proof Hiding Fraud
From Allstate Superior Except

STATE OF MICHIGAN

Brain Gaa
in on it

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

HUSSEIN SHEBLI,

Plaintiff,

v

No. 15-010057 NO
Hon. Daniel Hathaway

ALI SHEBLI,

Defendant.

15-010057-NO

FILED IN MY OFFICE
WAYNE COUNTY CLERK

HUSSEIN SHEBLI
Plaintiff in pro per
25834 Avondale
Inkster, MI 48141
(313) 334 8904

3/9/2017 2:28:43 PM
DONALD C. BROWNELL (P80048)
ANTHONY J. McEACHERN (P72022)
SAMANTHA N. BOYD (P80064) Precious Smith
VANDEVEER GARZIA, P.C.
Attorneys for Defendant
840 W. Long Lake Rd., Ste. 600
Troy, MI 48098-6340
(248) 312-2800
dbrownell@vgpclaw.com
amceachern@vgpclaw.com

**ORDER BARRING PLAINTIFF FROM CONTACTING ALLSTATE INSURANCE
COMPANY AND DEFENDANT ALI SHEBLI CONCERNING
CASE NO. 15-010057 NO**

At a session of said Court, held in the
City of Detroit, County of Wayne
State of Michigan on 3/9/2017

PRESENT: HONORABLE Daniel A. Hathaway
CIRCUIT COURT JUDGE

This matter having come before the Court upon Defendant's Motion, and the
Court being otherwise fully advised in the premises;

They Gave me Court and
would not stop contacting me

Answer from State

E.O.



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF INSURANCE AND FINANCIAL SERVICES
LANSING

PATRICK M. MCPHARLIN
DIRECTOR

June 28, 2017

Sam H. Shebli
25834 Avondale
Inkster, MI 48141

Dear Mr. Shebli:

SUBJECT: Consumer Services File Number: 159238-001
Company/Entity Contacted: Allstate Property and Casualty Insurance Company

We have received and reviewed the enclosed information regarding your complaint.

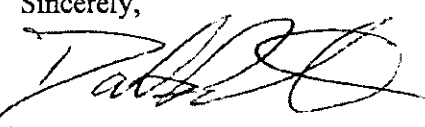
We have reviewed your concerns regarding the handling of your claim and can certainly understand your desire to have this matter resolved. Allstate's correspondence indicates litigation has been initiated regarding the concerns involved in your complaint.

As this matter has already proceeded to the Michigan legal system, we are unable to review this matter further. Therefore, once litigation has begun, it is best advised to continue with this process and working with your representation to address all of the concerns and issues regarding your complaint.

We would be happy to review this matter further at the completion of litigation. Once litigation is completed, if you have additional concerns regarding the handling of your claim, please forward documentation supporting your position and showing the insurer violated the provisions of the Michigan Insurance Code.

This will conclude our activity on this matter. If we can be of help in the future on another financial or insurance-related matter, please contact us. The Department cares about the quality of services we provide to Michigan consumers. We have enclosed a copy of our Customer Satisfaction Survey and would value your comments. Please take a moment to complete the survey and return it to Consumer Services; PO Box 30220; Lansing, MI 48909-7720 or fax it to (517) 284-8837. If you prefer to fill the survey out online it is located at www.michigan.gov/ocssurvey. Thank you for your participation.

Sincerely,


David Aldrich, Analyst
Consumer Services

David Aldrich

Enclosure

Street/Delivery Address: 530 W. ALLEGAN STREET, 7TH FLOOR, LANSING, MICHIGAN 48933
Mailing Address: P.O. BOX 30220, LANSING, MICHIGAN 48909-7720
www.michigan.gov/difs • TOLL FREE 877-999-6442 • LOCAL 517-284-8800

ALAN M. GERSHEL
GRIEVANCE ADMINISTRATOR

ROBERT E. EDICK
DEPUTY ADMINISTRATOR

CYNTHIA C. BULLINGTON
ASSISTANT DEPUTY ADMINISTRATOR

STATE OF MICHIGAN

ATTORNEY GRIEVANCE COMMISSION

BUHL BUILDING
535 GRISWOLD, SUITE 1700
DETROIT, MICHIGAN 48226
TELEPHONE (313) 961-6585
WWW.AGCM.ORG

ASSOCIATE COUNSEL

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KIMBERLY L. UHURU
DINA P. DAJANI
JOHN K. BURGESS
CHARISE L. ANDERSON
SARAH C. LINDSEY
JORDAN D. PATERRA
NATHAN C. PITLUK
MICHAEL K. MAZUR

March 21, 2017

PERSONAL AND CONFIDENTIAL

Hussein M. Shebli
25834 Avondale
Inkster, MI 48141

RE: **Hussein M. Shebli as to Brandon Shamoun**
AGC File No. 17-0630

Dear Mr. Shebli:

This office received your Request for Investigation, however, the allegations in your complaint are insufficient to warrant review by the Commission. Accordingly, after careful review by the staff, this matter is being closed under the authority of the Grievance Administrator pursuant to Michigan Court Rule 9.112 (C)(1)(a).

It is obvious that you are dissatisfied with the involvement of the attorney in this matter. However, the facts you have stated do not indicate that he has engaged in conduct which would be actionable by this office. As counsel for his client, he is obligated to protect and serve the best interests of his client. If you believe that he made inaccurate statements in pleadings or during argument to the court, you have the right to litigate your position before the court.

Brandon Shamoun has been provided with a copy of your Request for Investigation. If my staff or I can be of service to you in the future, please do not hesitate to contact us again.

Very truly yours,



Ruthann Stevens
Senior Associate Counsel

RAS/jmb

cc: Brandon Shamoun (w/enclosure)

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN

THEODORE LEVIN UNITED STATES COURTHOUSE

The United States is a land made up of all minorities, threw out this beautiful country, and if you look fare back enough, you will see, everyone on our land, is a immigrant from somewhere else in the world, I am a third generation Lebanese man, that's been here for 52 years, my biggest handy cap, is my name (Hussein), it has hurt me throughout my life, in so many situation, I can't even count, I am an American, I love my country, and raised my children to love it to. I always respected the laws, and the people, that enforce them, my evidence is beyond a reasonable doubt, yet I reported to 5 government agencies and two high courts, and was met with resistance that is overwhelming, because this firm, has friends, in high places, but they are not above the law, so I pray that this Honorable court puts this case, in front of a fair and impartial judge, that has no ties to this firm, and justice in our court's is possible. I reported to the FBI, Special Agent, Angela Bronson, in fear for my life at the ending of the litigations, and she pointed out, more misconduct, that everyone was overlooking, but that's all that was done, for the time being. I hope I can get justice, before going to the press, and the Supreme Court, but if that's what I have to do, I will, because, I am an American, and deserve justice, in our country, no matter what my name is.

Here are the agencies I reported to, including the circuit court, FBI, and the Court of Appeals and this firm reaches someone, somehow, to bounce me away, It's just, I can't go away, due to the fact of, it is a matter of life or death, in my situation, and I want to raise my grandkids and live a little longer than 52, and if others, have to face people like this, even if they are attorney's, then I'm doing them justice, The torture would overwhelm anyone, but, because I don't have a law degree, they are going to, get away, with whatever they want. That is their conclusion. But not mine, as long as I'm alive. God Bless You for your time Your Honor

Respectfully Hussein Shebli (Sam)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Hassan Shbl.

(b) County of Residence of First Listed Plaintiff

WAYNE

(EXCEPT IN U.S. PLAINTIFF CASES)

25834 Avondale, IN 46141

(c) Attorneys (Firm Name, Address, and Telephone Number)

DEFENDANTS

Vandeveer Garzia P.C.

County of Residence of First Listed Defendant

Vand

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

Case: 2:19-cv-10862

Judge: Friedman, Bernard A.

MJ: Majzoub, Mona K.

Filed: 03-25-2019 At 10:55 AM

CMP SHEBLI v VANDEVEER GARZIA P.C.,

ET AL (dat)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP

(For

- | | | | | |
|---|----------------------------|--|--------------------------------|--------------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 Incorporated or Principal Place of Business In This State | PIF <input type="checkbox"/> 4 | DEF <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

Act of 1871, 42 U.S.C. 1983 Civil Right

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

\$760,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND:

Yes

No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE 3-25-2019

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

☐ Yes
☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☐ Yes
☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

Notes :
